

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ARDUINO, LLC,

Plaintiff,

-v-

ARDUINO S.R.L. f/k/a SMART PROJECTS
S.R.L.; GHEO SA; CC LOGISTICS, LLC;
MAGYC NOW LTD; DOG HUNTER INC.; DOG
HUNTER LLC; DOG HUNTER AG; TULYP
HOLDING SA; GIANLUCA MARTINO;
FEDERICO MUSTO; and DOES 1-10,

Defendants.

Civil Action No.: 1:15-cv-10181-DJC

CONSENT MOTION TO EXTEND STAY OF DISCOVERY DEADLINES

Plaintiff Arduino, LLC respectfully submits this Consent Motion to Extend Stay of Discovery Deadlines. Plaintiff seeks a further stay of all discovery deadlines through July 31, 2016. Counsel for Defendants has reviewed and Defendants have consented to this motion.

The Parties' settlement negotiations have continued to progress and drafts are being exchanged. The Parties have agreed before the Judge in the co-pending Italian litigation to continue the suspension of all pending actions between the Parties.

The Parties first sought a joint stay of all deadlines on April 26, 2016 based on their "substantial progress in reaching an agreement to resolve this matter." Dkt. 60. Plaintiff sought a further extension of the stay on June 2, 2016 which was not opposed by Defendants. Dkt. 64. Your Honor granted this request with the Order of June 3, 2016. Dkt. 65. Plaintiff now seeks, with consent of Defendants, an extension of the stay through July 31, 2016 in order to allow the

Parties to remain focused on negotiating the worldwide settlement agreement without the distraction and burden of litigation. The Parties will notify the Court regarding the status of settlement at that time.

Respectfully submitted,

Dated: July 8, 2016

/s/ Martin B. Schwimmer
John L. Welch BBO#522040
Wolf, Greenfield & Sacks, P.C.
600 Atlantic Avenue
Boston, Massachusetts 02210-2206
Telephone: (617) 646-8000
Email:
John.Welch@WolfGreenfield.com

Martin B. Schwimmer (*pro hac vice*)
Lori L. Cooper (*pro hac vice*)
LEASON ELLIS LLP
One Barker Avenue, Fifth Floor
White Plains, New York 10601
Telephone: (914) 288-0022
Email: Schwimmer@LeasonEllis.com
Cooper@LeasonEllis.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Lori L Cooper
Lori L. Cooper